

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	CRIMINAL ACTION NO.
v.	§	
	§	3:11-CR-018-B
RENE QUIMBY (1)	§	

GOVERNMENT'S MOTION TO
DECREASE OFFENSE LEVEL UNDER USSG § 3E1.1(b)

The government asks the Court to decrease the defendant's offense level under USSG § 3E1.1(b) because (1) the defendant has clearly demonstrated acceptance of responsibility for his offense; (2) his offense level is 16 or greater; and (3) he has assisted authorities in the investigation and prosecution of his own misconduct by timely pleading guilty and agreeing to waive his appellate rights, thereby saving the government's and the courts' resources. *See also, United States v. Newson*, 515 F.3d 374 (5th Cir. 2008).

Therefore, the Government respectfully asks the Court to decrease the defendant's offense level by one additional level. The Government reserves the right to withdraw this motion should the defendant engage in conduct inconsistent with his acceptance of responsibility.

Respectfully submitted,

s/ Frank L. Gatto

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CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2011, I electronically filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case filing system ("ECF"). The ECF system sent a "Notice of Electronic Filing" to Carlton McLarty, counsel for defendant, who has consented in writing to accept this Notice as service of this document by electronic means. I also certify that an electronic notice was sent to the United States Probation Officer.

s/ Frank L. Gatto

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Assistant United States Attorney